

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: _____)
SHARONN E. THOMAS,) Chapter 7
Debtor.) Case No. 18-17430 (ELF)

)

RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Sharonn E. Thomas (the “Debtor”), by and through her undersigned attorneys, respectfully submits this Response to Motion of Motion of HSBC Bank USA N.A. as Indenture Trustee for the Registered Noteholders of Renaissance Home Equity Loan Trust 2007-2 for Relief from the Automatic Stay Under §362 Pursuant to Bankruptcy Procedure Rule 4001 (the “Motion”) filed by USBC Bank, N.A., as Indenture Trustee (the “Movant”) and states as follows:

1. Admitted.
2. Admitted.
3. Admitted in part, denied in part. Admitted that Movant services the loan. The Debtor is without information to admit or deny the remainder of paragraph 3; therefore, such allegations are denied.
4. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 4 of the Motion; therefore, such allegations are denied.
5. Admitted.
6. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 6 of the Motion; therefore, such allegations are denied.
7. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 7 of the Motion; therefore, such allegations are denied.

8. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 8 of the Motion; therefore, such allegations are denied.

9. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 9 of the Motion; therefore, such allegations are denied.

10. Denied. There is no current default under this Mortgage. Any default that may have existed on the date the Motion was filed, based on information and belief, has been cured.

11. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 11 of the Motion; therefore, such allegations are denied.

12. Denied. The Debtor is without information to admit or deny the allegations contained in paragraph 12 of the Motion; therefore, such allegations are denied.

13. Denied. Movant does not have cause since it is adequately protected given the fact that the Debtor has cured any arrears existing on the Mortgage.

14. Denied. The Debtor is represented by counsel and direct communications by counsel with represented parties are prohibited by the Pennsylvania Rules of Professional Conduct.

15. Admitted.

16. Denied. Movant is adequately protected given the fact that the Debtor has cured any arrears existing on the Mortgage.

WHEREFORE, the Debtor respectfully requests that the Court deny the Movant's Motion.

Dated: July 2, 2020

FLASTER/GREENBERG P.C.

By: /s/ Damien Nicholas Tancredi, Esq.
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